

United States Of America } Case No. 13-CR-6137  
✓ } Honorable  
Terrance Junot III } Judge Geraci  
8/31/20

## I Introduction.

There wasn't a day that went by that when I awoke in Monroe County Jail, or Allegany County Jail, CCA Ohio holding facility, or Kanin max in Pennsylvania, then to my final place of Loretto FCI that I don't feel remorse for my actions. The sadness in my heart for the victim and the victim's family can only be described as a devastating tragedy. I can't begin to understand or feel the pain and suffering I've caused the victim and the victim's family. And for that I am truly sorry. There is no excuse for my actions in the past, and I have to live my life everyday with this burden

forever. There are days where it is hard to function knowing the pain and suffering I have caused so many people in the victims lives and also my own.

Everyday is a constant reminder of the damage I have done, by being kept away from family, friends, jobs, and being a normal functioning member of society. And even after my time at Iorelto is up, the normal will never be the same. I will suffer my consequences for the rest of my life. Struggling with emotions of remorse, fear, anxiety, stress and sadness. Due to the life I must now live because of my past inappropriate, irresponsible and devastating choices.

I have suffered everyday for the last 7 and half years. Prison is not for the weak minded. To deal with being a sex offender has its own issues and longterm punishments in prison and outside of prison. Being segregated, bullied, threatened, not allowed to work certain jobs, play certain sports,

or do many other normal things the prison has to offer. So I have felt and feel the punishment and consequences everyday, all day, because of my actions in the past, I suffer mental and also physical fatigue, along with high anxiety. I have not only let the victim down and the victims family, but my family and friends and myself as well. I have 24 hours a day 7 days a week to think and reflect on my horrible actions of the past, which is a ongoing punishment to myself. I have lost almost everything and everyone in my life because of my actions, I truly regret the things that were said and done. People that were a big part of my that has passed away without being able to say ~~goodbye~~ goodbye or thank you, it's extremely hard to live with. There are days I don't want to get out of bed and deal with life because of the pain and sadness I feel for my actions in the past. To say I have not suffered or been punished long

enough, or learned any lesson's is a incorrect statement. To say that I couldn't possibly be rehabilitated is also incorrect. I have learned and learn daily many valuable ~~teso~~ lessons, and to make sure this type of crime / situation never happens again in my life.

## II

### Time Remaining

As the date of the filing of the compassionate release, I have served 69% of my 144 month sentence. I receive 1 and a half years of good time. Then with the new law of the First Step Act I recieved a additional 84 days of good time. Being that I have been a model inmate I have 2.5 years remaining with 6 months half way house.

## III

Extraordinary and Compelling reasons for my release

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I have showed proof of underlying conditions with my motion for supplement, using ~~exhibit~~ exhibit A, B. Showing that a current respiratory issue has not been resolved. Which means its still ongoing as I have previously stated. I have showed proof of family history of lung issues and er cancer to the best of my ability. Being that I cannot get their medical records. If more proof is needed the government can request information from my mother and father. Their contact info is as follows.  
Terrence Junot Jr (585) 455-4032.  
Cheryl Junot (585) 455-3950. They can refer you to the others in my current living relatives of family history's.

The CDC has said that underlying issues in a person's "respiratory" system can create life threatening complications if the person became infected with Covid-19 repeatedly over and over. Per the supplement I have demonstrated

all of the conditions that are needed for compassionate release.

In numerous courts they have found the risk of death and future complications from contracting covid-19, especially with inmates having underlying conditions satisfies the compelling and extraordinary reasons to grant compassionate release under 18 USC § 3582.

~~III~~ III

BOP cannot protect / Treat inmates in Covid-19 Pandemic.

Despite the BOP's plan for fighting Covid-19, staff members still brought the deadly virus into FCI Loretto. Just because Loretto got lucky this time and only infected 8% of the population since my filing for compassionate release, does not mean future outbreaks will not occur. And on any unit in the prison. It was luck that the virus stayed where it did. It also infected multiple people on NE which

upstairs from where I live. The ease of a future outbreak is especially true given the staff's attitude that they "beat Corona virus" which has led to lax mask usage by staff. There is a new policy that strictly limits quarantine time for people going to outside medical visits, its (less than 1 day of quarantine), and also self surrenders (3 to 5 days or less). The rush to reopen the compound to normal activity levels, and plans to restart inter facility transfers with 2 to 3 weeks. There has been multiple inmate cross mixing or contamination of units in different parts ~~off~~ of the Compound. Until there is a vaccine for COVID-19 I am at risk of death, or future complications.

The government stated that I have not shown that FCI Loretto cannot adequately protect or treat ~~in~~ inmates from COVID-19. However in my original motion I included data and case cites showing that this is in fact true.

## V Safety to the Community

In my original motion I outlined my status as a model inmate, statistics about the extremely low recidivism rate for sex offenders and my close community and family ties.

The government stated that I have not tried to receive treatment, however the BOP sent me to a facility, where no treatment programs are available for sex offenders. I have asked repeatedly about (SOMP) programs. Loretto says that they do not offer Sex Offender Management programs. Treatment is a condition of my supervised release, and is a more mental health treatment and mentally intensive than any program that the BOP can offer. Many of these programs are available even with COVID-19 restrictions, including phone based, and 1 on 1 counseling. Meaning I will be able to get treatment immediately upon my

release. I have had my family do research for programs to start right away upon my release.

VI

3553(a) factors.

The government stated that my guideline range was 169 to 210 months. My Plea agreement was actually for 120-168 months, and the honorable judge geraci gave me 144 months, which was inside the guidelines.

I have served 69% of my sentence (84 of 123 months accounting for good time) which means I have less than 3 years remaining.

I plan to fully comply with all conditions of my supervised release, including having no unsupervised access to minors. The residence I have currently lined up to live has no minors living there. That can be confirmed by calling the contact I have listed in my motion for supplement. (Jody Jaibert)

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My employment is as a auto technician, which will not bring me in contact with minors. Given these facts along with the other factors stated above including my family and community ties, proves that I will pose no risk to the community, or anyone I come in contact with.

## VII Conclusion

Given my risk for severe health complications and or death from Covid-19, my solid release plan, and my extremely low risk of recidivism per the first step act calculations. That makes me an excellent candidate for compassionate release. I hereby ask this honorable court to grant my compassionate release or any other relief that the court See fit.

Respectfully Submitted  
Terrance Junot III  
Terrance Junot III  
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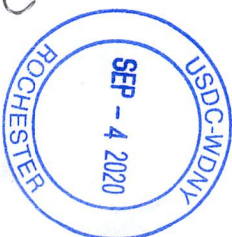
France Junos III

22303055

Federal Correctional Institution, Leeth.

Box 1000

Clerk of The Court  
US Federal Court House  
100 State St. - Room 2120  
Rochester NY 14614.



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